

IN THE ABSTRACT:

Delete the abstract and insert therefor the new abstract submitted herewith on a separate sheet.

REMARKS

In the last Office Action, dated July 6, 2000, the abstract was objected to as exceeding 250 words. Claim 1 was rejected under 35 U.S.C. §112, second paragraph, as being indefinite. The Examiner stated that claim 1 interchangeably recites the limitations "one or more consumer units", "the at least one consumer unit" and "the consumer unit", but that there is insufficient antecedent basis for these limitations.

Claims 1-2, 4-6, and 12 were rejected under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 5,909,673 to Gregory ("Gregory").

With respect to claim 1, the Examiner stated that Gregory discloses one or more consumer units operated by a consumer (citing Fig. 1; col. 6, lines 23-30; col. 22, lines 40-50); communications means connectable over a communication medium to at least a coupon server (citing col. 6, lines 23-30; col. 8, lines 4-20); a user input device to permit a consumer to make one or more choices displayed on the display monitor (citing col. 6, lines 23-30; col. 7 lines 65-67; col. 8 lines 1-10); a coupon server located remotely from the one

or more consumer units (citing col. 3, lines 52-59; col. 6, lines 54-55) comprising a memory for storing first data corresponding to one or more participating retail outlets including data for identifying each of the retail outlets by name and inventory of goods offered for sale (citing col. 6, lines 54-64; col. 7, lines 1-31), second data containing coupon data used for generating electronic discount coupons for selected goods (citing col. 7, lines 20-31); a data processing unit having communication means connectable over the communication medium to the at least one consumer unit (citing col. 8, lines 2-7); first means responsive to a connection with a consumer unit to transmit for display on the display monitor of the consumer unit a first rule containing a list of participating retail outlets which may be individually selected by the consumer using the user input device (col. 3, lines 57-67); second means responsive to the selection of a retail outlet by the consumer to transmit to the consumer unit a second file containing first data corresponding to the selected retail outlet for display on the display monitor of the consumer unit, the second file containing the identity of goods offered for sale by the selected retail outlet, and the displayed goods being individually selected by the consumer using the user input device (col. 3, lines 57-67); and third means responsive to the selection of one or more items of

goods by the consumer to transmit a third file for display on the display monitor of the consumer unit containing second data corresponding to the selected goods, the third file containing electronic coupons corresponding to one or more of the selected goods (citing col. 3, lines 57-67).

With respect to claim 2, the Examiner stated that Gregory discloses means for acquiring identifying indicia for identifying the geographical location of a consumer unit connected thereto (citing col. 6, lines 23-28; col. 6, lines 54-64; col. 7, lines 1-31); selecting one or more participating retail outlets in the vicinity of the consumer unit (citing col. 7, lines 1-31); and downloading for display on the display monitor of the consumer unit the first file containing a list of the selected retail outlets (citing col. 7, lines 20-31).

Claim 3 was rejected under 35 U.S.C. §103(a) as being unpatentable over Gregory (U.S. Patent No. 5,909,673), and further in view of U.S. Patent No. 6,055,513 Katz et al. ("Katz"). The Examiner stated that Gregory does not disclose means for acquiring caller ID data to identify the geographical location of the consumer unit, but that Katz discloses means for acquiring caller ID data to identify the geographical location of the consumer unit (col. 16 lines 9-17). In view of this disclosure, the Examiner has taken the

position that it would have been obvious to one skilled in the art at the time the invention was made to combine Gregory and Katz such that the invention is carried out over a public telephone network and is provided with means for acquiring caller ID data to identify the geographical location of the consumer unit, because this capability provides obvious and useful enhancements to the invention for the expeditious identification of callers.

Claims 7-8 were rejected under 35 U.S.C. §103(a) as being unpatentable over Gregory. The Examiner stated that Gregory discloses a point-of-sale unit located in a participating retail outlet (citing col. 6 lines 23-28), and that, the point-of-sale unit is described in col. 6, lines 23-29 and col. 22, lines 33-50 as a computer and associated components, and a hardcopy apparatus (col. 6 lines 28-30).

The Examiner took official notice that a computer is comprised of a display monitor, a memory for storing data to be displayed on the display monitor, a data processing unit, a hardcopy apparatus, and a user input device, and further concluded that it would have been obvious to one skilled in the art at the time the invention was made to combine Gregory and old and well known art to disclose a point of sale unit comprising a hardcopy apparatus, a display monitor, a memory for storing data to be displayed on the display monitor, a

data processing unit, a hardcopy apparatus, and a user input device, because this configuration provides functionality that is necessary for the invention to operate.

Claims 9, 10, and 11 were rejected under 35 U.S.C. §103(a) as being unpatentable over Gregory in view of U.S. Patent No. 5,848,399 to Burke ("Burke"). The Examiner stated that Gregory does not disclose data representative of the physical layout of the participating retail outlets indicating the location of the goods offered for sale, means responsive to the selection of one or more items of goods by the consumer to transmit a file for display on the display monitor of the consumer unit containing data identifying the location in the selected retail outlet of the goods selected by the consumer, nor that the second file contains graphical data for displaying a representation of the physical layout of the goods in the selected retail outlet. The Examiner pointed out, however, that Burke discloses that an output of the retail space management system 52 is a three-dimensional description 56 of the store space, including product descriptions (UPC information), shelf and product sizes and locations in three spatial dimensions, and product category locations, preferably in Cartesian coordinates. Typically, the description 56 includes a floor plan which indicates the location and sizes of each product category within the store.

A file is also generated for each product category, indicating the product and shelf sizes and locations for the product category. This description 56 can be stored in a store database 61, accessible by an indication of the store 59 which it describes (citing col. 4, lines 58-67; col. 5, lines 1-25). In view of this disclosure, the Examiner has taken the position that it would have been obvious to combine Gregory and Burke to disclose data representative of the physical layout of the participating retail outlets indicating the location of the goods offered for sale, fifth means responsive to the selection of one or more items of goods by the consumer to transmit a fifth file for display on the display monitor of the consumer unit containing data identifying the location in the selected retail outlet of the goods selected by the consumer, and that the second file contains graphical data for displaying a representation of the physical layout of the goods in the selected retail outlet, because this would allow the users or customers to more easily locate the specific items or goods that they want to purchase and will enhance customer attraction to the merchant.

Claim 13 was rejected under 35 U.S.C. §103(a) as being unpatentable over Gregory in view of U.S. Patent No. 5,855,007 to Jovicic et al. ("Jovicic"). The Examiner stated that Gregory does not disclose that the coupon server

comprises an Internet host computer, but that Jovicic discloses an electronic coupon communication system for generating and redeeming unique product discount coupons over public computer networks such as the Internet, comprising a first Internet node, an Internet coupon server and an Internet coupon notification center.

By the present response, a new abstract having less than the maximum number of prescribed words has been submitted, and claim 1 has been amended to overcome the indefiniteness rejection thereof. Claims 9 and 10 have been amended in minor respects. In other respects, claims 1, 9 and 10 remain unchanged and no changes have been made to these claims which would necessitate a further search or the application of new grounds of rejection. Applicants therefore respectfully request that the next action not be made final in the event the present response does not lead to allowance and a new ground of rejection is applied against any of claims 1-13.

In addition to the foregoing amendments, new method claims 14-26 have been added. Although these claims recite a method of targeted coupon distribution rather than a system for distributing coupons, they are similar in scope to original claims 1-13. In this regard, newly added independent claim 14 contains the functional limitations of claims 1, 9

and 10. Dependent claims 15-24 are similar in scope to dependent claims 2-8 and 11-13 but are in method form. Newly added independent claim 25 is a method claim reciting the functional language of claims 1, 2, 9 and 10.

The original and newly added claims recite the use of a coupon distribution system including plural consumer units for receiving coupons and other information over a network from a coupon server which stores and transmits files containing store data, inventory data and coupon data, and further set forth a particular process for coupon distribution containing several clearly defined steps.

More specifically, newly added claim 14 sets forth the steps of (1) establishing a link between a consumer unit computer and a coupon server computer over a communications medium; (2) transmitting from the coupon server to the consumer unit a list of participating retailers; (3) displaying the list of retailers on the consumer unit so that the consumer may select one of the displayed retailers; (4) transmitting from the coupon server to the consumer unit a list of the inventory of goods of a selected retailer; and (5) in response to the selection of one or more items of goods by the consumer, transmitting from the coupon server to the consumer unit a file containing coupons for the selected goods. These limitations also appear in newly added

independent claim 25 and also in original system claim 1 in the context of means-plus-function recitations.

For the reasons discussed below in connection with amended claim 1 and dependent claims 2-13, applicants respectfully submit that newly added claims 14-26 recite subject matter that is not anticipated or rendered obvious by the cited prior art.

Amended claim 1 and dependent claims 2, 4-6, and 12 are not anticipated by Gregory. Gregory does not disclose a coupon distribution method which includes the components recited in claim 1. Gregory merely discloses an online system for generating financial instruments comprising a central server connectable to remote processing stations at multiple remote sites such as convenience stores for printing money orders and similar drafts.

In Gregory, a remote processing station is used to create and print financial instruments such as money orders, payroll checks, vendor drafts, and gift certificates on blank paper using a standard laser printer. Transaction logs are maintained and communicated to the central server where records for all locations are maintained. The central server authorizes payroll checks for the employees of the remote locations and sends authorization to the locations where the actual payroll checks are printed. Gregory also discloses

that the system can be used to create and distribute site-specific coupons to remote locations. In order to achieve this, a general coupon template is loaded onto the central server of the data processing system along with site-specific information to be printed on each coupon. A particular remote processing station at a remote site can call in to the central server and download the general coupon template and the site specific information for that particular site. The remote processing station then combines the template with the site-specific information and prints the site-specific coupon.

However, Gregory does not disclose a coupon distribution system of the type recited in claim 1, which recites a consumer unit operated by a consumer that is used to (1) display a list of participating retail outlets; (2) allow a consumer to select a particular retail outlet from the displayed list; (3) display a list of the inventory of goods offered for sale by the retail outlet; (4) allow the consumer to select one or more of the displayed list of goods; and (5) obtain coupons for the selected goods after making the foregoing selections. Gregory fails to disclose all of the foregoing structure and merely discloses a central server connectable to retail outlets (not consumers) for generating and printing financial instruments for sale to consumers on blank paper, and additionally printing a coupon on the same

sheet of paper as the financial instrument, the coupon being tailored for the particular retail outlet in which the consumer purchases the financial instrument. While the coupon may be specifically tailored to a particular retail outlet, this is not tantamount to allowing the consumer to select a particular retail outlet, select from the inventory of goods available at that retail outlet, and automatically obtain coupons for the selected goods. The single coupon generated by the Gregory system is not in any way based upon the selection of goods by a consumer.

More specifically, Gregory discloses a system for printing money orders, payroll checks, negotiable checks, gift certificates, and for printing a site-specific coupon along with the financial instrument. The coupons are individualized to specific remote locations. A general coupon template is stored in the central server, and details customized to a specific location (convenience store) are provided that are added to the general template to form a site-specific coupon that is printed along with a financial instrument generated by the system. Specific coupons are tailored to a particular store including specific details such as the amount of the discount on the coupon, the days and hours the coupon is valid, the location at which the coupon is valid, the expiration date of the coupon, and the product to which the

coupon applies. However, the coupons are not based on consumer selection of retail outlet or type of goods as required by claim 1.

Accordingly, Gregory does not disclose the claim 1 structure reciting a coupon server for transmitting for display on a consumer unit operated by a consumer a file containing a list of participating retailers, and allowing the consumer to select one of the retailers. In Gregory, the retailer itself operates a computer which establishes a link with a central server to download financial instruments and associated coupons which are sold by the retailer to a consumer.

Nor does Gregory disclose or suggest the claim 1 structure of the coupon server, which requires that the coupon server transmit to a consumer unit, in response to the selection by the consumer of one of the displayed retailers, a list of the inventory of goods of a selected retailer and displaying the list on the consumer unit. In Gregory, a financial instrument is printed by a remote computer located at a retail outlet under the control of a central server and coupon data is printed along with the financial instrument based on a template stored on the central server and particular transaction instructions stored on the remote computer. Gregory contains no disclosure whatsoever

concerning the display on a consumer unit of a plurality of participating retail outlets selectable by a consumer or the transmission of a file containing inventories of selectable goods for display on the consumer unit based on the selection of a participating retail outlet.

With respect to the targeted distribution of coupons, Gregory merely discloses a method which allows retailers (not consumers) to customize coupons for specific locations. For example, if a certain product does not sell well at a particular location, a coupon can be distributed that provides a greater discount at that location than the discount provided at other locations.

A site-specific coupon is created in accordance with Gregory by using a general coupon template and modifying the template with information specific to a particular location. Some information like the product, product logo, legal disclaimer, and the like is fixed for all coupons while other information like the discount, expiration date, location and the like is variable. A general coupon template can either be a digital representation of a complete coupon including all art work, logos, and text, or it can be an incomplete coupon with art work, logos and general text with specific information missing such as the amount of the discount, valid hours and dates, particular product or valid location. If the

general coupon template is a complete coupon, the site-specific information used to make the site specific coupon overwrites the corresponding information on the complete coupon replacing it when the site specific coupon is printed. Likewise, if the general coupon template is an incomplete coupon the site-specific information is inserted into the blanks on the template, thereby creating a complete site-specific coupon.

Figs. 5A and 5B of Gregory are flowcharts illustrating the manner in which the financial instrument distribution system shown in Fig. 1 of Gregory can be used to distribute site specific coupons. Fig. 5A shows the process by which site specific coupons are distributed from the central server to each of the remote locations and Fig. 5B shows the process by which the remote location uses the information from the central server to create the site specific coupon particular to that remote location.

A block 602 represents the loading of a general coupon template on the central server 12 of Fig. 1. The general coupon template from block 602 is the necessary artwork, logos and general information to appear on the final coupon. The general coupon template can be a complete coupon including all necessary information, or can be an incomplete coupons which is missing the information that is particular to

each individual site. The site specific information can be information such as the amount of the discount, the hours and days the coupon is valid, and the address of the valid location for coupon redemption. The site specific information is placed in site specific information files which are also loaded on the central server 12 as represented by block 604. However, Gregory does not disclose that the site specific location consists of the inventory of goods sold by plural retail outlets as recited in claim 1. If the general coupon template is a complete coupon, the site specific information need only be the information to be modified to make the coupon site specific. This information replaces or overlays the information existing on the complete coupon template. Conversely, if the coupon template is an incomplete coupon, the site specific information must include the information necessary to complete every blank in the template. This site specific information is added to the incomplete coupon template to fill in all the blanks.

In order to ensure that the remote processing station 14 of Fig. 1 receives the proper coupon templates, a location instruction file is created on the central server 12 for each particular remote location as shown by block 606. The remote processing station 14 of Fig. 1 uses a modem 21 to call and log onto the central server 12 as represented by

block 608. Block 610 represents the remote processing station accessing the location instruction file created in block 606.

The location instruction file contains instructions that the remote processing station 14 follows when the remote processing station communicates with the central server 12. These instructions include all aspects of the communication between the two data processing systems, but specifically regarding the site specific coupons, the location instruction file tells the remote processing station which general templates to download for this remote location and which site specific information files to download for the general templates. The downloading of these files by the remote processing station is represented by block 612. Block 612 is performed by the method illustrated in Fig. 4 of Gregory. After the instructions in the location instruction file have been completed, the remote processing station ends communication with the central server as shown by block 614.

The central server is not involved with the actual printing of the coupons at the remote location, but merely provides the remote processing station with the information necessary to print current coupons.

Fig. 5B is a flow chart that shows how the general template and the site specific information is used by the remote processing station and the accompanying printer to

produce a site specific coupon. Block 620 represents the remote processing station 14 sending the general coupon templates to a printer 18 and storing them in random access memory of the printer. If the printer contains enough random access memory, multiple coupon templates can be stored allowing the remote processing station to choose which of the coupons available in the printer memory will be printed. The templates are generally loaded into the printer when the system is initialized.

Block 622 represents the remote processing station 14 receiving an instruction to print a coupon. The remote processing station 14 indicates which coupon will be printed, or randomly selects a coupon from the templates available as shown by block 624. Once the particular coupon is selected, the site specific information necessary to complete the coupon is sent from the remote processing station to the printer, as represented by block 626.

As noted above, claim 1 recites a system having a coupon server which transmits and displays on a consumer unit a file containing a list of participating retail outlets for selection of a retail outlet by a consumer and another file containing the inventory of goods sold at the selected retail outlet. The coupon server is responsive to consumer selections to distribute coupons based on a series of selected

goods (e.g., a shopping list) entered by a consumer. Gregory contains no corresponding disclosure.

As recognized by all Courts and the Board of Appeals of the U.S. Patent Office, anticipation under 35 U.S.C. §102 requires the disclosure, by a single reference, of all claimed subject matter. In the absence of any disclosure of the consumer-selectable lists of plural retail outlets and the consumers-selectable inventories of goods displayed on the consumer unit, as recited by independent claim 1, anticipation cannot be found. See, e.g., Akzo N.V. v. U.S. International Trade Commission, 1 USPQ2d 1241, 1245 (Fed. Cir. 1986), cert. denied, 482 U.S. 909 (1987) ("Under 35 U.S.C. §102, anticipation requires that each and every element of the claimed invention be disclosed in the prior art"); W.L. Gore & Associates v. Garlock, Inc., 220 USPQ 303, 313 (Fed. Cir. 1983), cert. denied, 469 U.S. 851 (1984) ("Anticipation requires the disclosure in a single prior art reference of each element of the claim under consideration"); Continental Can Co. USA v. Monsanto Co., 20 USPQ2d 1746, 1748 (Fed. Cir. 1991) ("When more than one reference is required to establish unpatentability of the claimed invention anticipation under §102 can not be found"); Lindemann Maschinenfabrik GmbH v. American Hoist & Derrick Co., 221 USPQ 481, 485 (Fed. Cir. 1984) (emphasis added) ("Anticipation requires the presence in

a single prior art reference disclosure of each and every element of the claimed invention, arranged as in the claim"); In re Sun, 31 USPQ2d 1451, 1453 (Fed. Cir. 1993) (unpublished) ("Under section 102(b), anticipation requires that the prior art reference disclose, either expressly or under the principles of inherency, every limitation of the claim"); Scripps Clinic & Research Foundation v. Genentech Inc., 18 USPQ2d 1001, 1010 (Fed. Cir. 1991) ("Invalidity for anticipation requires that all of the elements and limitations of the claim are found within a single prior art reference ... There must be no difference between the claimed invention and the reference disclosure, as viewed by a person of ordinary skill in the field of the invention").

Since Gregory does not identically disclose the transmission and display of lists of user-selectable participating retail outlets and inventories of goods, it cannot be deemed to anticipate amended claim 1.

In addition, dependent claim 2 and dependent claim 4 recite the additional features that the coupon server further comprises means for acquiring identifying indicia for identifying the geographical location of the respective consumer unit, and that the first file (the list of participating retail outlets) from the coupon server to the respective consumer unit includes only participating retail

outlets in the geographical vicinity of the respective consumer unit, so that only retail outlets in the geographical vicinity of the respective consumer unit are displayed on the display monitor of the consumer unit.

According to the limitations of claim 2, the list of participating retail outlets stored in the coupon server is customized for each consumer so that only those retailers located in the vicinity of the consumer are identified on the consumer unit. Gregory contains no corresponding disclosure.

In view of the foregoing, applicants respectfully submit that Gregory does not anticipate the invention defined by independent claim 1 and dependent claims 2 and 4, and that the rejection thereof under 35 U.S.C. §102(e) should be withdrawn. Since each and every limitation set forth in independent claim 1 is not found in Gregory, the reference does not anticipate the claimed invention.

In addition, applicants respectfully submit that Gregory does not disclose the subject matter cited by the Examiner. In particular, the Examiner stated that Gregory discloses at col. 6, lines 54-64 and col. 7, lines 1-31 a coupon server comprising a memory for storing first data corresponding to one or more participating retail outlets including data for identifying each of the retail outlets by name and inventory of goods offered for sale and, at col. 7,

lines 20-31, second data containing coupon data used for generating electronic discount coupons for selected goods. Applicants respectfully note that the cited portions of Gregory do not disclose the aforementioned subject matter.

Nor does Gregory disclose at col. 3, lines 57-67 first means responsive to a connection with a consumer unit to transmit for display on the display monitor of the consumer unit a first file containing a list of participating retail outlets which may be individually selected by the consumer using the user input device. The cited portion of Gregory merely discloses the use of a coupon template as described above. Although the Gregory system discloses the generation and distribution of site specific coupons, the Gregory system does not allow consumers the opportunity to select a site.

Gregory also fails to disclose means responsive to the selection of a retail outlet by the consumer to transmit to the consumer unit a second file containing first data corresponding to the selected retail outlet for display on the display monitor of the consumer unit, the second file containing the identity of goods offered for sale by the selected retail outlet, and the displayed goods being individually selected by the consumer using the user input device. The Examiner contends that such disclosure is contained at col. 3, lines 57-67 of Gregory. As noted above,

however, the cited portion of Gregory merely discloses the concept of a coupon template. As pointed out above, Gregory does not disclose or suggest means allowing a consumer to select a retail outlet from a list of participating retail outlets and to select goods from a displayed inventory of goods made available for sale at the selected retail outlet.

Applicants further respectfully submit that claims 9-11 patentably distinguish over the combined references to Gregory and Burke. Burke was cited as disclosing data representative of the physical layout of the participating retail outlets indicating the location of the goods offered for sale, and means responsive to the selection of one or more items of goods by the consumer to transmit a file for display on the display monitor of the consumer unit containing data identifying the location in the selected retail outlet of the goods selected by the consumer.

Applicants respectfully note, however, that claim 10 recites that the file transmitted from the coupon server to the respective consumer unit in response to the selection of one or more items of goods by the consumer contains data identifying the location in the selected retail outlet of the goods selected by the consumer.

Stated otherwise, claim 10 does not recite a virtual shopping store of the type disclosed by Burke. To the

contrary, claim 10 recites a method in which a list of selected goods, or a consumer's shopping list, is transmitted to the user by the coupon server in a format which identifies the consumer's selected goods along with a printout of the location in the selected retail outlet of the selected goods and coupons for the selected goods.

Burke, on the other hand, discloses the generation of a simulated supermarket on a television set or monitor which enables consumers to purchase goods. Burke does not disclose an online representation of an actual shopping store, but discloses an entirely simulated store. Burke clearly does not disclose the production of a list of selected goods and the locations in a selected actual retail store at which those goods are located. Using the present invention, consumers physically visit the selected store after obtaining coupons for selected goods online and the location of the selected goods in the selected store is made simple by a printout identifying the location in the selected store at which the consumer may find the selected goods. This is markedly distinct from the Burke reference.

Accordingly, applicants respectfully submit that the subject matter of claim 10 is markedly distinct from that disclosed in Burke, and that the rejection under 35 U.S.C. §103(a) is in error and should be withdrawn.

A claim rejection based upon obviousness under 35 U.S.C. §103(a) must be supported by evidence establishing the obviousness of each and every limitation of a rejected claim. This burden cannot be established by a cited reference which discloses some of the limitations of a rejected claim, and an unsupported conclusion that others would have obvious. There must be some teaching, reason, suggestion, or motivation found in the prior art to make a combination or modification which renders an invention obvious within the meaning of 35 U.S.C. §103(a). See, e.g., Symbol Technologies, Inc. v. Opticon, Inc., 935 F.2d 982, 989, 18 USPQ2d 1885 (Fed. Cir. 1991).

The Examiner must not only demonstrate that this teaching exists in the prior art, but that it would teach all limitations of the claim. Thus, the citation of two or more which when combined do not yield each limitation of a rejected claim is not a satisfactory ground of rejection. Stated otherwise, in rejecting a claim as obvious under 35 U.S.C. §103(a), the Examiner cannot simply rely on a combination of references that teach some limitations of the claim, and make mere conclusory allegations that the combination teaches others as well.

In the instant case, the Examiner has not met his burden of establishing a prima facie case of obviousness for the reasons discussed above. Claim 1 is not anticipated by

Gregory for the reasons discussed in detail above. Under the foregoing standards, Gregory clearly does not render amended claim 1 obvious.

Since Burke fails to disclose or suggest the user-selectable lists of participating retailers and inventories of goods, as recited by amended claim 1, or the transmission of a customized list of selected goods along with their physical location in the selected retail outlet, as recited by dependent claim 10, the continued rejection of claim 10 under §103(a) would not satisfy the standards discussed above. As stated by the Board of Appeals in Ex Parte Clapp, 227 USPQ 972, 973 (BPAI 1985):

... To support the conclusion that the claimed combination is directed to obvious subject matter, ... the references must expressly or impliedly [disclose or suggest] the modifications urged by the examiner to have been obvious.

The same situation exists here. There is nothing in the references that would expressly or impliedly teach or suggest the use of the user-selectable lists of claim 1 or the customized list of claim 10.

For the foregoing reasons, applicants respectfully submit that original claims 1-13 and newly added claims 14-26 patentably distinguish over the prior art of record.

In view of the foregoing amendments and discussion,
the application is now believed to be in condition for
allowance. Accordingly, favorable reconsideration and
allowance of the claims are most respectfully requested.

Respectfully submitted,

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